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ENVIRONMENTAL QUALITY

DIVISION OF AIR COLLITY

October 31, 2012

**Public Comment** Division of Air Quality P.O. Box 144820 Salt Lake City, UTAH 84114-4820

Subject: Subsection IX Part A.21 of the PM<sub>2.5</sub> State Implementation Plan (SIP) for the Salt Lake City, Utah Non-attainment Area

The Wasatch Front Regional Council (WFRC) appreciates the opportunity to comment on Subsection IX Part A.21 of the PM<sub>2.5</sub> State Implementation Plan (SIP) for the Salt Lake City, Utah Non-attainment Area proposed by the Division of Air Quality (DAQ) released for public comment on October 1, 2012. WFRC also appreciates the opportunity to be an involved partner in developing the SIP as a member of the Interagency Consultation Team as set forth in Subsection XII of the SIP and the August 25, 2005 Memorandum of Agreement between DAQ and WFRC. The PM<sub>2.5</sub> SIP proposed by DAQ demonstrates a 117.3 tons/day reduction in emissions in the year 2019 compared to 2008 levels of emissions. The majority of these emission reductions (85%) are attributed to mobile sources as a result of improved vehicle technology, vehicle emission testing and repairs, expanded transit options, and other alternatives to automobile travel.

## **New Socio-economic Forecasts**

In section 6.7 of the SIP, DAQ has identified that 4.2 tons per day of additional emission reductions are necessary in order to demonstrate attainment of the National Ambient Air Quality Standards (NAAQS). The emission inventories prepared for the SIP were based on population and employment data prepared by the Governor's Office of Planning and Budget in 2008. In 2012 the GOPB updated its projections including the year 2020 population and employment which generally shows a reduction of 7% to 8% compared to the 2008 projections. The WFRC believes it is important for DAQ to work with its partners to evaluate the impact of these revised GOPB projections on attainment of the NAAQS for PM<sub>2.5</sub> prior to submitting the SIP to EPA for approval. All sources of emissions are impacted to some degree by the population and employment forecasts. It may be that attainment of the standard is still not achieved even with the new lower projections, but at least the commitment targets would be revised to more readily achievable levels which is a crucial consideration in selecting the appropriate emission control strategies required to reach attainment.

## **VOC & Direct PM Emissions Increase for Point Sources**

As mentioned above, total emissions from all sources will be lower in 2019, the attainment year, than 2008 emissions, the EPA designated non-attainment year. However, DAQ has identified direct emissions of PM<sub>2.5</sub> (DPM) and volatile organic compounds (VOC) as needing further reductions in order to demonstrate attainment to the NAAQS. Specifically, as documented in the SIP, DAQ has determined that for the Salt Lake PM<sub>2.5</sub> non-attainmentarea DPM needs to be reduced by 1.2 tons per day

by DAQ as key to reaching the air quality standard, point source emissions are projected to increase from 2008 to 2019 by 0.7 tons per day and 2.1 tons per day, respectively, while area and mobile source emissions are projected to decrease. WFRC is concerned that the increase in point source emissions for these two pollutants places additional burden on mobile sources and area sources. WFRC requests that, as further emission reductions are considered, a balanced strategy is utilized to improve air quality.

## Conclusion

If emissions reductions are still needed after further modeling with the new socioeconomic forecasts, WFRC looks forward to working with DAQ to study any additional transportation-related emission controls mentioned in Table 6.6, Additional SIP Controls Identified for Feasibility Studies of Section 6.7 of the SIP in accordance with the procedures set forth in the Transportation Conformity Consultation (Section XII) section of the SIP and the Memorandum of Agreement between DAQ and WFRC.

Sincerely,

Andrew S. Gruber Executive Director